



**FACT SHEET**  
**Public Comment Period**  
**Statement of Basis and Proposed Remedy**  
**WDC Acquisition LLC**  
**Solid Waste Management Unit 12 – Solid Waste Landfill**  
**Creston, Union County, Iowa**

REGION 7: Iowa, Kansas, Missouri, Nebraska, and Nine Tribal Nations

## INTRODUCTION

The U.S. Environmental Protection Agency (EPA) Region 7 invites the public to comment on the Proposed Remedy (Proposed Corrective Measures) for the Solid Waste Management Unit (SWMU) 12 – Solid Waste Landfill at WDC Acquisition LLC, 1746 Commerce Road, Creston, Iowa (EPA ID No. IAD065218737). Additionally, EPA seeks comment on the study and analysis (Corrective Measures Study) that supports the Proposed Remedy.

## PROPOSED REMEDY

EPA is proposing corrective measures to address contamination at SWMU 12, located at the facility, consisting of excavation of non-hazardous solid waste material until reaching the waste in-place grades; leaving waste in place; installation of a final cover system compliant with the Iowa Department of Natural Resources (IDNR); periodic inspections including visual inspections, groundwater monitoring, and hydrologic inspections; leachate controls; and institutional controls.

The goal of the landfill cover is to prevent contact and ingestion of solid waste, contaminated groundwater, and stormwater to those in its proximity, such as on-site workers, construction workers, off-site residents, and ecological receptors, by isolating the contaminated material.

This cover system is considered highly effective in the long term, with minimal failure risks, and its projected life is considered indefinite with proper care. The final cover system encapsulates the remaining waste and therefore mitigates waste mobility.

EPA encourages the public to review this Proposed Remedy for SWMU 12 and the Administrative Record, which contains documents supporting the Proposed Remedy.

**The public comment period will run from Feb. 24 through March 27, 2023.** Comments on the Proposed Remedy for SWMU 12, Corrective Measures Study, or public availability session requests (see Page 2) must be mailed or emailed in writing no later than **March 27, 2023**, to:

**Patricia Murrow**  
EPA Region 7 (LCRD/ROAG/RDIS)  
11201 Renner Boulevard  
Lenexa, KS 66219  
Email: [murrow.patricia@epa.gov](mailto:murrow.patricia@epa.gov)

### ***Guidelines for Commenting:***

- Explain your views.
- Tell us if you support or disagree with the recommendation. Please be specific.
- Can you provide alternatives?

## BACKGROUND

The facility was initially developed and operated by Hills McCanna Corporation of Chicago as an aluminum and magnesium foundry during 1965. The facility has remained in operation since that time, primarily engaged in foundry activities. The current owner, WDC Acquisition LLC (WDC), acquired the property in May 2018, and has operated it as a manufacturer of magnesium and aluminum alloy castings primarily for the aerospace industry.

Corrective action work at the facility is being implemented by WDC, pursuant to several agreements that require the investigation and cleanup of the facility.

The solid waste landfill, SWMU 12, which is being considered for Final Remedy, is estimated to be the same age as the rest of the facility, meaning it was established in the 1960s. The use of this landfill resulted in numerous constituents being found and possibly impacting human health and the environment in the area.

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The landfill was originally designed to be 650 feet by 600 feet and reach a maximum depth of 15 feet; however, in the 1990s, the waste depth maximum was expanded to 40 feet. In 2010, excavation of the waste material at the landfill began and continues today. This waste material is being used as daily cover at various landfill locations, in accordance IDNR's approval. It is also noted that a vast majority of the waste now present is silicon dioxide in the form of crystalline silica (common sand).

## CONTAMINANTS

The focused Corrective Measures Study for SWMU 12, performed in 2020, provides results that indicate that contaminants of concern exist in soil, surface water, and groundwater at levels exceeding human health risk-based levels that must be addressed. The contaminants include aluminum, arsenic, barium, beryllium, boron, cadmium, chloride, chromium, cobalt, copper, fluoride, iron, lead, lithium, magnesium, manganese, nickel, nitrate/nitrite-N, silver, sodium, strontium, sulfate, tin, zinc, vanadium, benzene, 1,1-dichloroethane, cis-1,2-dichloroethane, 1,3,5-trimethylbenzene, vinyl chloride, and xylenes.

The waste landfill, which has no engineered liner system, does have a leachate collection system already in place and operating. However, the groundwater has already come into contact with the solid waste mass, as groundwater is also reported to vary between 3 and 8 feet below ground surface (from 2018 Leachate Control System Evaluation Report).

In the 1993 Resource Conservation and Recovery Act (RCRA) Facility Assessment report, there is also mention of previous (1970s) low-level radioactive waste burials at the far western side of the landfill, and chromium-bearing wastewater treatment sludge burials in the 1970s and 1980s. The low-level waste burial area is being addressed under the terms and conditions of the existing Iowa Department of Public Health (IDPH) Radioactive Material License, and is not part of the RCRA corrective action.

## FOR MORE INFORMATION

A copy of the Statement of Basis, Corrective Measures Study, and other information is available for public review during normal business hours at the following locations:

### **EPA Region 7 Records Center**

11201 Renner Boulevard  
Lenexa, KS 66219  
Toll-free: 1-800-223-0425

Gibson Memorial Library  
200 West Howard St.  
Creston, IA 50801  
Phone: 641-782-2277

If the Statement of Basis and other information is not physically available (e.g., due to COVID-19), an index and/or electronic copy can be provided upon request by contacting Amelia Holcomb (see below).

An EPA public availability session has not been scheduled, but will be held if there is sufficient public interest. Requests for a public availability session must be made in writing to Pat Murrow at the address listed above and must state the nature of issues proposed to be raised at the session. EPA will evaluate any request and hold a formal public availability session if it is determined that a session will contribute to the decision-making process by clarifying significant issues affecting the remedy.

After consideration of all comments received, EPA will make a Final Remedy decision for SWMU 12. If the decision is made to select a Final Remedy that is substantially unchanged from the Proposed Remedy for SWMU 12, EPA will notify all persons submitting comments or requesting a notice of the final decision. If the Proposed Remedy for SWMU 12 is substantially changed, EPA will issue another public notice indicating the changes.

If you have questions or want to receive further information, please contact **Amelia Holcomb**, Community Involvement Coordinator, EPA Region 7 (ORA/OPA), 11201 Renner Boulevard, Lenexa, KS 66219; toll-free at 1-800-223-0425; or by email at [holcomb.amelia@epa.gov](mailto:holcomb.amelia@epa.gov).